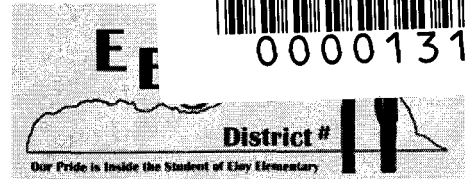


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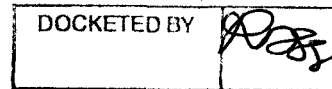
November 14, 2011

Chairman Gary Pierce  
Commissioner Bob Stump  
Commissioner Sandra D. Kennedy  
Commissioner Paul Newman  
Commissioner Brenda Burns  
The Arizona Corporation Commission

Arizona Corporation Commission

DOCKETED

NOV 28 2011



**RE:** Comments to proposed changes to 2011-2013 Schools and Government Program  
APS 20 12 REST Implementation Plan (Docket No. E-0 1345A- 1 1-0264)

Dear Chairman Peirce and Commissioners,

I am writing in support of the continuation and if possible expansion of the third party owned portion of the 2011-2013 Schools and Government program. As Superintendent of the Eloy Elementary School District, one of the states' most impoverished districts, I am very happy I had the opportunity to use the competitive RFP process to obtain the best solar solution for the district. By using the competitive bidding process the district was able to identify the third party best qualified to meet the district's needs in terms of cost and solar implementation.

As an additional comment, I prefer the third party owned arrangement where the solar power that is collected on the school is used by the school. As opposed to the utility owned systems where the solar power collected from the school is put onto the grid with no direct use by the school. This aesthetic of having the school truly powered by solar energy provides substantial value to the district.

I understand some proposals in front of the Commission would eliminate the needs based incentive from the third party owned S&G program. Eliminating such a program will prevent other impoverished Arizona school districts from benefitting from this successful and highly competitive third party ownership portion of the 2011-2013 Schools and Government program.

Sincerely Yours,

Ms. Ruby James  
Superintendent, Eloy Elementary School District

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